Analysis of Public Comment

to the

Draft Wilderness

Management Policy

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United States Department of the Interior
Bureau of Land Management

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Contents

Chapter I

A. History and Background

The Federal Land Policy and Management Act of 1976 (FLPMA) requires the Secretary of the Interior to review areas of the public lands determined to have wilderness characteristics, and to report to the President his recommendations as to the suitability or nonsuitability of each such area for preservation as wilderness. The Secretary is required to report his recommendations to the President by October 21, 1991, and the President is required to report his recommendations to Congress by October 21, 1993. During the period of this review and until Congress acts on the President's recommendations, the Secretary is required to manage such lands so as not to impair their suitability for preservation as wilderness, subject to certain exceptions and conditions. Once Congress designates an area for preservation as wilderness, the provisions of the Wilderness Act which apply to national forest wilderness areas will apply to BLM administered wilderness.

1. The Wilderness Review Process

The BLM wilderness review program stems from section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA). In FLPMA, Congress gave BLM its first unified, comprehensive mandate on how the public lands should be managed. The law establishes a policy of generally retaining the public lands in Federal ownership, and it directs the BLM to manage them under principles of multiple use and sustained yield. The BLM is to prepare an inventory of the public lands and their resources, including identification of areas having wilderness characteristics. Management decisions for the public lands are to be made through a resource management planning process that considers all potential uses of each land area. All public lands are to be managed so as to prevent unnecessary or undue degradation of the lands.

Under FLPMA, wilderness preservation is part of BLM's multiple-use mandate, and wilderness values are recognized as part of the spectrum of resource values and uses to be considered in the inventory and in the resource management planning process. Section 603 of FLPMA specifically directs the BLM, for the first time, to carry out a wilderness review of the public lands.

To carry out the wilderness mandate of FLPMA, the Bureau of Land Management has developed a wilderness review process with three phases: inventory, study, and reporting to Congress.

Inventory: In the wilderness inventory, the BLM examined the public lands, with public participation, and identified those areas that meet the definition of wilderness established by Congress. These areas were identified as wilderness study areas (WSA's). The inventory was completed by November 14, 1980, in the contiguous Western States, resulting in identification of approximately 24 million acres as wilderness study areas and in elimination from further wilderness consideration of approximately 150 million acres.

Study: Each wilderness study area will be studied through the BLM resource management planning system to analyze all values, resources, and uses within the area. The findings of the study, including public participation, determine whether the area will be recommended as suitable or nonsuitable for designation as wilderness. In practice, determining an area's "suitability or nonsuitability . . . for preservation as wilderness," in the words of FLPMA, means determining whether the area is more suitable for wilderness designation or more suitable for other uses.

Reporting: When the study has been completed, a recommendation as to whether the wilderness study area is suitable or nonsuitable for designation as wilderness is submitted through the Secretary of the Interior and the President to Congress. A mineral survey will be conducted by the U. S. Geological Survey and Bureau of Mines for any area recommended as suitable. Reports on all wilderness study areas must reach the President no later than October 21, 1991, and reach Congress by October 21, 1993. Only Congress can designate an area as wilderness.

2. The Draft Wilderness Management Policy

During January 1981, the Bureau of Land Management published the "Draft Wilderness Management Policy".

The Draft Wilderness Management Policy describes how the Bureau of Land Management (BLM) proposes to manage lands administered by the BLM which are designated by Congress as part of the National Wilderness Preservation System. The BLM's Wilderness Management Policy will apply to public lands specifically designated as wilderness by an Act of Congress. The document closely parallels the existing wilderness management policy of the U. S. Forest Service.

Public comment on the draft policy was solicited by an announcement and publication of the document in the Federal Register (Vol. 46, No., January 16, 1981). Additionally, Copies of the Federal Register were mailed to 57,000 individuals and groups nationwide. All comments received through April 17, 1981, are included in this analysis effort. Comments received after that date are not included in this analysis, but were reviewed individually and will be considered in the development of the final management policy.

3. Public Comment Period

The January 16, 1981, publication of the Draft Wilderness Management Policy announced the opening of a 75-day public comment period. All comments were to be received by the BLM Washington office by April 1, 1981.

Approximately 320 comments were received representing individuals, organizations, industries and governments. All comments received by April 17, 1981, were included in this analysis. Comments received (approximately 64) after this date were reviewed individually and will be considered in developing the final policy.

B. Method of Analysis

The purpose of this analysis is to objectively identify and display the nature and extent of the public input received which discussed the BLM's Draft Wilderness Management Policy. This report is a summary display of the analysis efforts. The analysis does not evaluate the value or importance of the comments received. These judgements will be incorporated in to the final management policy to be published by the Director during the summer of 1981.

The method used to analyze these comments was a content analysis system using Codenvolve techniques. This system is specifically designed to provide an objective display of the nature and extent of the contents of numerous and diverse public inputs.

The basic concept of this system is that the common denominations of virtually all public input are opinions offered for, against or about the issues in question, along with the reasons that may be given to support the opinion. The number and kinds of supporting reasons can vary considerably, even when those given support the same opinion.

The basic goal of a systematic analysis of public input is to identify and display the opinions and supporting reasons contained in the public imput and how they differed according to other variables that may be important, e.g., form of input, respondents' residence, etc.

The system used for this analysis had several steps:

1. Identify basic questions for which the decision-makers need answers.
2. Survey the inputs to determine the breadth of issues discussed.
3. Develop a code book and coding form to guide the coding of the inputs. The coding categories are defined by the content of the input itself.
4. Read and code each input as to the opinions and supporting reasons they contain and enter the information on the coding form. Reliability checks of the accuracy of the coding were made continuously.
5. Assemble the opinions and supporting reasons into a set of organized tables which display the content of the public input.

The major emphasis of the process is in the coding of individual inputs (part 4 above). This necessitated careful training of coders through discussion of the code book, joint coding, reliability checks and group discussions to ensure uniform application of the system.

This analysis system coded many variables such as form of input, residence of the respondent, number of inputs, number of signatures, etc. This information was placed on edge punch cards which make the data easily retriveable. This information is also retrievable in combinations.

The analysis of public comments, and resulting summary report, provide a useful tool to help decision-makers decide and aid the public in evaluating decisions made. The summary format allows the reader to

efficiently identify areas of interest and pursue detailed information where needed. However, this report is not intended to replace or reduce the importance of reading individual letters. The judgment as to the importance of information received depends heavily upon a personal knowledge gained through reading individual inputs.

C. Report Format

The intent of this report is to summarize the nature and extent of public comments received. Data gathered in the analysis is displayed primarily through tables. This is intended to promote objective display of the data with a minimum of interpretation.

Public comments received during the comment period fell into several major categories:

1. General Comments (including comments on wilderness not related to the management policy.)

2. Comments on the General Policy section of the draft.

3. Comments on Specific Activity Guidance

Part A of Analysis Results is a summary discription of the inputs received and demographic data.

Part B summarizes comments on major issues of importance identified by management.

Part C contains a summary of comments on other parts of the draft document.

It must be remembered that this report is analysis of the public inputs. The weight, importance and validity of the comments received is evaluation and is not a part of this report. Evaluation is conducted by the decisionmaker.

In the information that follows, numbers are presented in both Inputs (I) and Signatures (S). For example: one person wrote three letters, the resulting tally would be I=1 and S=3.

Chapter II

Analysis Results

Approximately two-thirds of the comments received were in the form of personal letters. The remaining one-third were in the form of pre-typed post cards or form letters. All of the form-type responses and one-third of the personal letters were worded almost exactly alike. They were sent in as a response from a request in an editorial in The Trapper, published by the North American Trappers Association. Readers were encouraged to request the sentence relating to commercial trapping be removed from the policy.

Many industry letters contained similar comments and phrases and were most likely derived from one or two primary sources.

A. Who Responded

Table 1

TOTAL	
Input	Signatures
319	333

Table 2

Form of Input

	Input	Signatures
Personnal Letter	213	227
Form Letter/Card	106	106
Petition	0	0
Total	319	333

Table 3

Group Type

	Inputs	Signatures
Individual	203	203
Informal	4	8
Formal	36	41
Corporation	31	33
Government	45	48
Other	0	0
Total	319	333

Table 1 displays the group types respresented by the respondents. The respondent (S) may have been an individual representing himself or they may have been two or more family members. A formal group is a recognized organization while an informal group might be a group of friends or associates who formed primarily to author an input. A corporation is an incorporated company while a government would be an input representing the official opinion of a local, county, state or federal government agency.

Table 4

Affiliation

	Inputs	Signatures
None Given	206	207
Mining	5	5
Oil and Gas	22	25
Club/Organization	15	16
Environmental	8	11
University	2	2
Other	61	67
Total	319	333

Table 4 shows the affiliation or principal interest of the respondent. Respondents may have identified themselves as offical representatives of groups involved with any of the above affiliations or may have stated a personal vested interest such as a leasee or mining claim holder. If the respondent did not clearly state a specific affiliation, then he/she was placed into the "None Given" category.

Table 5

Area of the Country (Origin of input)	Input	
	Input	Signature
West	24	258
East	54	54
Other	18	21
Total	317	333

If the comment originated in any of the 11 western states with BLM lands it was coded "West". Comments originating in any other state were coded "East". Other was used for comments from outside the U.S. or where no point of origin could be determined.

B. Responses on the Issues

1. Major Topics of Managerial Concern

The following topics were identified by management prior to the analysis as areas of concern. These sections of the draft policy are not to be interpreted as necessarily the most important policy issues or the most controversial issues. A complete listing of management concerns and questions can be found in Appendix 2. They will also be discussed at other points in this analysis.

a. Questions/Comments on General Policy

(1) Questions to be answered:

- Was the draft adequate, or does it need to be revised?
- What type of changes would strengthen the document?
- Should the policy be similar to the Forest Service policy?
- Were the following General Policies adequate or should they be changed (or deleted)?

(2) General Policies

(a) Preservation of Wilderness Character
(b) Visitor Use
(c) Nonconforming Use
(d) Prohibition of Use
(e) Minimum Tool
(f) Structures and Installations
(g) Land Acquisition
(h) Research
(i) Buffer Zones
(j) Administration
(k) Visitor Information/Education

(a) Preservation of Wilderness Character

Solitude Policy

# of Comments	Comment
2	Clarify policy.
1	Erroneonsly equates with natural setting.
1	Emphasis on solitude should not restrict opportunities for primitive recreation.

Naturalness

# of Comments	Comment
2	Good to recognize fire/insect/disease as natural process.
2	Recognize States rights on wildlife management.
1	Protect flora and fauna.
1	Clarify hunting and fishing will be allowed under State law.
1	Cattle grazing is incompatible.
1	Maintain vegetative types in various life zones.
1	Need method to determine threat of insect/fire/disease to human life.
1	BLM should not manage wildlife as implied when stated "minimize human influence".

Special Features

# of Comments	Comment
1	Statement "BLM will maintain unimpaired ..." seems contradictory.

Preservation of Wilderness Character

# of Comments	Comment
1	Should always be subject to existing private rights.

(b) Visitor Use

# of Comments	Comment
1	Favors policy on "risks" involved in using wilderness.
1	BLM should not provide emergency services.
1	Remove lands from wilderness once carrying capacity is reached.
1	Provide springs/water for health and safety of visitor.

(c) Nonconforming Uses

# of Comments	Comment
Valid Existing Rights	
2	-Agree with policy.
1	-"Consider on case-by case basis" is unacceptably vague and unconstitutional.
Aircraft and Motorboats	
2	-New uses established under IMP should not be allowed.
2	-Allow only long established uses.
1	-Apply "minimum tool" standard.
1	-Don't limit use of existing airstrips.
1	-Distinguish between public and agency use of existing airstrips.
1	-Agency can't monitor use of aircraft and motorboats.
Control of Fires, Insects, and Diseases	
	-(no comments on General Policy)
Gathering Information About Resources	
2	-Agree with policy.
1	-"Minimum Tool" policy must apply.
1	-Activity must be temporary with immediate restoration.
1	-Need policy on recurring mineral surveys.
Proposed Water Resource Facilities	
1	-Manage Presidential approved facilities to prevent unnecessary/undue degradation.
1	-BLM does not have authority to manage facilities designated by President.

Existing Water Resource Facilities

1 -Should not include grazing improvements.
1 -Follow Congressional Grazing Guidelines for all facilities.
1 -Comply with Dam Safety Act.

Livestock Grazing

2 -Support/concurs with policy.

Minerals Management

4 -Expand Mineral Leasing section/more specifies.
3 -Need policy on valid existing rights after 1983.
3 -No authority to deny leasing because of wilderness values.
2 -Inadequate for rights of claiments.
2 -SD should decide on mineral leasing.
2 -Contridicts Wilderness Act and Mineral Leasing Act.
2 -Don't require restoration to higher quality.
2 -BLM cannot require permit to use motorized vehicles.
2 -Temporary vs permanent harm standard for leasing.
1 -Add section on: existing prospecting permits; preference right lease applications, and pre-existing lease locations.
1 -Allow removal of common varities of mineral materials.
1 -Mining claiment must comply only with reasonable conditions governing ingress and egress.
1 -Non-occupancy provisions severly limit use, not a reasonable stipulation.
1 -More direction and restrictions on use of timber.
1 -Require removal of structures once no longer needed.
1 -Require revegetation of all disturbed areas.
1 -Policy regarding "owner in fee of subsurface minerals" incorrect.
1 -No mining - conflicts with naturalness.
1 -Stipulations must be reasonable.
1 -Supports general policy.
1 -Require reclamation when rights terminate.
1 -Bonding and immediate restoration needed.
1 -Must require revegetation with native species.
1 -More specifics on stipulations.
1 -Does 12/31/83 deadline apply?

Commercial Services

1	-Need specific standards

Access

3	-Base selection of a route on standard of repairable vs irrepairable harm.
3	-No authority to require bond.
1	-Support policy
1	-Change "until" to "unless".
1	-Expand/clarify policy.
1	-Make every effort to acquire inholdings.
1	-Must result in least impact.
1	-Require bond.
1	-Describe purpose, manner and degree of use.
1	-Need a safeguard to assure reasonable access.
1	-No written authorization should be required.
1	-Change "reasonable" to "have right".
1	-Conditions for access to inholdings contridicts Wilderness Act.

General Comments

1	-Key Wilderness Act phrases misinterpreted.
1	-Allow nonconforming uses "in a manner that will as closely as possible achieve nondegradation of the areas wilderness character".
1	-Do not allow non-conforming uses.
1	-Unclear for SCS role.
1	-Clarify relationship between unnecessary/undue and principle of nondegradation.
1	-Allow these uses only after public has opportunity to review.
1	-Policy too general and nonspecific.
1	-Energy concerns not covered.
1	-Define "validly established".
1	-Non-conforming uses do not displace other uses.
1	-Some of these uses are not permanent

(d) Prohibition of Uses-

# of Comments	Comments
1	-Reference to commercial enterprises may eliminate grazing, mining, etc.
1	-Lifesaving safety projects may need additional ROW.
1	-No improvements should be allowed.
1	-Use of aircraft and motorboats more restrictive here than elsewhere in policy.
1	-May eliminate SNOTEL shelters.

1	-Consider emergency landing of aircraft.
1	-Allow equal provisions for ORV and camping as for mining and grazing.
1	-Change "minimum" to "cost effective".
1	-Allow prior use of ORV's.
1	-Prohibit all ORV's.

(e) Minimum Tool

# of Comments	Comments
3	-Consider economic effect as priority over means used.
2	-Controlled burning as accepted tool, equipment, etc. is inappropriate.
2	-Permitted use of motorized transport should contain safegards against abuse.
1	-Favors minimum impact activities.
1	-Add - to provide for emergency access by military personnel & equipment.
1	-Economics as a minor consideration here should not be so elsewhere in policy.
1	-Disagree where nonconforming uses apply.
1	-Support policy.
1	-Drop "minimum" and use cost effective and practical.
1	-More than minimum tool may be required for health and safety for highway ROW.

(f) Structures and Installations -

# of Comments	Comments
2	-Need further evaluation of historic/prehistoric not qualified for National Register.
1	-Allow State Highway Depts. to enter for maintenance of S & I.
1	-Clarify entire section.
1	-Those not qualified for rentension should be allowed to "deteriorate naturally".
1	-No new shelters.
1	-Existing shelters maintained until they deteriorate, then removed.
1	-Allow new and maintenance of structures for fish and wildlife conservation.
1	-Section needs to be more specific.

(g) Land Acquisition

# of Comments	Comments
2	-BLM should not acquire lands.

1	-Exchange between the State and Federal government should be in the public interest.
1	-Value of State land should be based on "highest and best use " before designation.
1	-Acquistion of State lands should include public hearings - add to policy.
1	-Agrees with policy.
1	-Acquisition through eminent domain infeasible for subsurface mineral estate.
1	-Land exchanges should be given highest priority.
1	-Compensate State trust for surrounded or adjacent State lands.

(h) Research

(No comments on General Policy)

(i) Buffer Zones and Adjacent Lands

# of Comments	Comment
11	Favors policy.
1	Field managers should not abuse.
1	After "from activities" add "on public lands".
1	-Last sentence - add: ". . . unless this is consistent with the RMP for the area."
1	-Strike sentence - "Mitigation of impacts . . . seriously impede such activities".
1	-Certain activities outside wilderness may impede (e.g. clean air).
1	-Need more safeguards to protect Wilderness from activities on adjacent lands.
1	-Protect adjacent lands from wilderness impacts.
1	-Establish buffer zones for highways.
1	-Policy establishes de facto buffer zones.
1	-Should have buffer zones if outside activities threaten wilderness area.
1	-Consider economic effects of wilderness management on adjacent lands.
1	-Consider economic effects of noxious weeds on adjacent lands.
1	-BLM must not impair multiple use on adjacent lands.

(j) Administration

# of Comments	Comments
6	Hiring of personnel against sec. 2 (b) of Wilderness Act
1	Supports coordination policy.
1	Management plans should reflect status of subsurface ownership & protection of rights.

1	Coordination - include Indian Tribal Govt's.
1	Management plans should include MOU's.
1	Management plans should include participation of State Departments of Transportation.
1	-Clarify - other agencies governments may not override wilderness management mandates.
1	-Include financial analysis in Wilderness Management Plans.
1	-Coordinate management with State agencies.

(k) Visitor Information/Education

(no comments on General Policy)

b. Specific Activity Guidance

Were the following Specific Activity Guidance adequate, or should they be changed (or deleted):

(1) Recreation and Visitor Use
(2) Cultural and Historic Resources
(3) Forestry Resources
(4) Fish and Wildlife
(5) Fire, Insect and Disease Management
(6) Water Resources Management
(7) Air Quality
(8) Rangeland Management
(9) Mineral Management
(10) Administrative Structures and Facilities
(11) Use of Motorized and Mechanical Equipment
(12) Research and Studies
(13) Implementation of the Wilderness Management Policy

(1) Recreation and Visitor Use

# of Comments	Comments
1	-Eliminate reference to possibility that recreation and visitor use may be entirely prohibited.
1	-Visitor use should be dispersed in Wilderness.
1	-Supports proposed policy of preservation of wilderness character taking presidence over visitor use.
1	-Clarify policy on public use.
1	-Supports concept of establishing carrying capacity.
1	-Favors resolving conflicts to favor uses dependent on Wilderness
1	-Do not restrict use - "sacrifice" heavy use areas.

(a) Visitor Management

# of Comments	Comments
2	Indirect methods should apply to recreational livestock - not grazing.
2	Include section on responsibility of visitor.
2	Do not limit visitor use unilaterally by "manipulation of the fishery resource".
1	Title "Wilderness Rangers" implies nature of job in violation of sec. 2 (b) of Wilderness Act.
1	BLM should not provide emergency services.
1	Remove lands from wilderness system once carrying capacity reached.
1	Wilderness Rangers should be classified as indirect management.
1	Supports use of Wilderness Rangers to inform/regulate use.
1	Do not use permit system.
1	Consider user fees for heavily impacted areas.
1	Supports use of direct and indirect methods. Approves regulating use of pack tools.
1	Supports use of zoning to distribute visitors.
1	Good section on non-regulatory approaches.

(b) Improvements and Facilities

# of Comments	Comments
1	Section on signing is contradictory.
1	Strengthen "pack it in, pack it out" philosophy by changing "encouraged" to "enforced".
1	Facilities only for health and safety of visitor.
1	Provide drinking water and portable toilets in heavily used areas.
1	Agrees - management plans should carefully analyze role of outfitter-guide.
1	Needs for improvements must be explained in wilderness management plan. Guidelines too general.
1	Allow no improvements or facilities.
1	Should "require" cook stoves.
1	Should allow orienteering contests.

(c) Trails

# of Comments	Comment
2	Give DM specific guidelines for setting goals and objectives

2	Recognize visitor capacity and use levels.
2	More specific guidelines on bridges.
1	Ambigious statements - trails allowed if they serve recreationists and are compatible with wilderness values.
1	Allow no trails as convience to visitors.
1	Allow trails if part of National Trail System
1	Primary trails required to bypass heavy use areas only if no alternative.

(d) Signing

# of Comments	Comment
1	Allow none for visitors.

(e) Outfitter Camps

# of Comments	Comment
2	Use visitor use capacity to determine need.
1	Should be away from trails.
1	Allow no caches.

(f) Contests

# of Comments	Comment
1	Policy infringes upon right to enjoy public lands.

(g) Fuelwood

# of Comments	Comment
1	Require use of portable cook stoves.

(2) Cultural and Historic Resources

# of Comments	Comment
1	Include reference to Indian religious rights - American Indian Religions Freedom Act P.L. 95 - 341.
1	Contrary to general policy.
1	Change 2nd sentence, 2nd Para - "Research will be allowed to continue . . .".
1	Evaluate cultural resources in each wilderness.
1	Change reference to 36 CFR 1204 to 36 CFR 1202.6.

1	An MOU is required (36 CFR 800) whenever an adverse effect determination is made (not just for data recovery).
1	Policy is consistent with native American resource concerns.
1	Designate sites or structures as minimum tool.
1	Difficult to assess impacts on deterioration of unidentified sites.
1	MOU only for sites determined eligible for National Register.

(3) Forestry Resources

# of Comments	Comment
2	Allow cutting of trees and shrubs for mining leases.
1	Allow hazard tree removal along highways
1	Harvest timber for fire, insect and disease control.
1	Allow more mgt. flexibility
1	Consider alternatives to tree cutting for administrative purposes - cut only dead or down trees.
1	Precluding mechanical equipment for forestry places heavy burden on taxpayer.
1	Prohibition of reforestation inconsistent with good management and clean Water Act.

(4) Fish and Wildlife

a. General

# of Comments	Comment
5	"Prohibit", not "discourage" killing of non-game birds.
4	Cite and establish management criteria in WMP, MOU's, etc.
4	Review policy in light of state juidiction.
2	Wildlife management is jurisdiction of states.
1	Include Indian Tribal Conservation Dept's. in coordination efforts.
1	Special exceptions should be allowed for wildlife health epidemics.
1	Game management favored over other resources.
1	Last paragraph first sentence add "or MOU and in the wilderness management plan.
1	State may not be interested in protecting non-game species.
1	Cooperative agreements/MOU's should be developed between BLM and States to manage fish and wildlife species.

1	Involve adjacent landowners in wildlife management decisions.
1	Allowing natural processes to occur implys BLM management of wildlife.
1	Statement on allowing sport hunting, etc. under state law is ambiguous.
1	Address issue of preservation of wilderness values vs preservation of rare/endangered species.
1	Review IAFWA policies and guidelines.

(b) Wildlife Habitat

# of Comments	Comment
3	Allow no habitat manipulation.
3	Allow no prescribed burning.
1	Too permissive with activities to enhance wildlife.
1	Support habitat improvement measures.
1	Consider livestock activities when improving habitat.
1	Prescribed burning different than Forest Service policy.
1	Reduce grazing allocations to increase natural prey populations.
1	Restrict human influence on habitat.

(c) Wildlife Manipulation

# of Comments	Comment
1	Include public input in wildlife manipulation decisions.

(d) Fish Stocking

# of Comments	Comments
1	Favors policy on stocking of barren waters.
1	Policy should follow IAFWA guidelines.
1	Do not limit to off visitor-use season.

(e) Trapping

General

# of Comments	Comments
1	Allow no trapping.
1	Include in Hunting and Fishing section.

Commercial Trapping *

# of Comments	Comments
170 *	Drop sentence relating to commercial trapping.
7	States should have jurisdiction over trapping.
5	Define commercial trapping.
4	Allow commercial trapping.
4	Policy as written would prohibit all trapping.
3	Hard to distinguish between commercial and hobby trapping.
2	States should determine harvest levels.
1	Policy is unenforcible.
1	Don't outlaw trapping.
1	Add: "Trapping of furbearers by individuals will be allowed"
1	Forest Service defines term.
1	Combine with Hunting and Fishing section.
1	Interior would have to hire own trappers if public not allowed.
1	Do not justify harvest program on population levels.
1	Agree, no commercial enterprise allowed.

* The large number of comments relating to commercial trapping was due primarily as the result of an editorial in the March 1981 issue of the Trapper, a monthly newsletter published by the North American Trappers Association (see Appendix). The editor's note stated proposed regulations for federal BLM lands would allow no 'commercial' trapping on 20 million plus acres of mostly western lands". Readers were encouraged to request the sentence, "Commercial trapping will not be permitted," be removed from the policy. As a result, 77 personal letters, 57 form post cards, and 36 form coupons were received asking that the sentence be dropped.

Rodents

# of Comments	Comments
1	Policy too restrictive.
1	Protect outside values from rodents.
1	Clarify term.

Predators

# of Comments	Comments
3	Recognize state laws.
2	Favors policy.
2	Delete policy.
2	Control programs should be no different than in other areas.
1	Control programs should be directed by FWS & state agencies.
1	Allow aircraft hunting.
1	Allow use of poison baits and cyanide guns.
1	Clarify term "predator".
1	Don't limit to off-season.
1	Not consistent with Wilderness Act and Animal Damage Control Act.
1	Animal removal better than case-by-case.

Fire, Insect, and Disease Management

(a) General Fire Guidance

# of Comments	Comments
2	Add: " . . . unless otherwise provided in this policy."
1	Be consistent with Forest Service policy.
1	Untimely suppression will allow fire to spread outside wilderness.
1	Do not control fire.

(b) Natural Fire

# of Comments	Comment
2	Support policy.
1	Allowing natural fire to burn will be sufficient to maintain historic setting - no prescribed burning.

(c) Prescribed Burning

# of Comments	Comment
3	Be consistent with Forest Service policy.
2	Do not allow.
1	Supports policy.

(d) Insect/Disease Control

# of Comments	Comment
1	Do not protect timber vegetation by use of chemicals.
1	Allow control of noxious weeds and grasshopper infestations to protect adjacent lands.
1	DM should decide when artificial controls are necessary.
1	Only EPA approved insecticede applied by a licensed applicator.

(e) General Comments

# of Comments	Comment
2	Add policy on man-caused fire - be consistent with FS.
1	Consider economic effect of controls on adjacent lands.
1	Consider economic effects of control/uncontrol of noxious weeds.
1	Fire Management Plan should include high value resources and heavy fuel load areas.
1	No presuppression measures which leave more than temporary evidence.

(6) Water Resources Management

(a) Watershed Restoration

# of Comments	Comment
1	Require State Director, not Director approval for restoration projects.
1	Do not include water resource facilities if more important than wilderness.

(b) Water Improvements

New Water-Development Structures

# of Comments	Comment
3	Sec. 4 (d)(4) allows for more than just water development.
1	Stronger language needed to discourage development of new water projects.
1	Same provisions for new-structures as apply for snow measurement.
1	Delegate Presidential authority to DM.
1	Allow grazing related structures.
1	Only DM should approve
1	Allow maintenance of existing structures.

Existing Structures

# of Comments	Comments
1	Allow use of mechanical equipment for irrigation.
1	Use of primitive tools and transport causes undue hardship and high costs.

Snow Measurement

# of Comments	Comment
1	Allow helicopters for snow survey at new sites.

Weather Modification

# of Comments	Comment
1	Policy should apply to oil and gas potential.
1	Policy should not apply outside wilderness.
1	Items 1 and 2 conflict regarding helicopters.

(d) Water Resources Management

(e) Saltwater Intrusion

# of Comments	Comment
1	Supplies Santa Ottavia, not Director responsible for implementing programs.
1	Has not fought water transfer facilities in area - important clean wildrivers.

(f) Water Improvements

New Water-Development Structures

# of Comments	Comment
2	Sec. 4 (a)(1) allows for more than just water development.
1	Encourage San Luis Reservoir to accommodate demand - or new major projects.
1	Exec provisions for non-exempt uses as apply for water management.
2	Delegate Executive-Legislative authority to EA.
2	Allow greater reduced storageness.
1	Only DM review.
1	Allow maintenance of existing structures.

Existing Structure

# of Comments	Comment
1	Delay use of mechanical equipment for irrigation.
1	Use of portable tools and equipment, more-efficient pumpingly and high costs.

Long Reservoir

# of Comments	Comment
2	Allow helicopters for non-owners as new sites.

Water Utilization

# of Comments	Comment
1	Policy should apply to all and not selectively.
1	Policy should not apply only to wildrivers.
1	Allow 1 and 2 cubic-c certain buildings.

(7) Air Quality

# of Comments	Comment
1	Wilderness areas should all be Class I.

(8) Rangeland Management

(a) Livestock Grazing Operations

# of Comments	Comment
4	Support policy.
1	Do not adopt Forest Service policy.
1	Policy fails to follow Wilderness Act.
1	More emphasis needed on improving efficiency of rangeland use.
1	Consider planned grazing systems.

Congressional Grazing Guidelines

# of Comments	Comment
3	Do not allow increased grazing - phase out.
2	Favor inclusion of guidelines.
1	Guidelines 1, 3, 4 and 5 exceed intent of Wilderness Act.

Rangeland Improvements

# of Comments	Comment
2	No restrictions on use of motorized vehicles.
2	Involve permittees in all planning.
2	Remove criteria # 1, 8, 11 & 12.

Structural Rangeland Improvements

# of Comments	Comment
3	Should be allowed if necessary to maintain existing levels.
2	Test for use of native material should be "unreasonable", not "prohibitive".
1	". . . a reasonable", not "agreed upon" maintenance schedule.
1	New improvements should not be allowed to increase numbers of livestock.

1	Provide fencing easily passable by visitors.
1	Liberalize policy towards new grazing activities.
1	Use "degree of impact" to resource rather than level of grazing.
1	Allow no structures for grazing.

(4) Non-Structural Rangeland Improvements

# of Comments	Comments
2	Control weeds if they have on economic effect on adjacent lands.
1	Don't allow expansion of pre-existing non-structural rangeland improvements.
1	Allow prescribed burning and fertilizing only where necessary and a prior practice.
1	Don't allow prescribed burning.
1	Vegetative manipulation is inconsistent with wilderness values.
1	Favor policy.
1	Allow control programs for noxious weeds and grasshopper infestations.

(b) Recreational Livestock

# of Comments	Comments
1	Allow no "non-local" hay in wilderness.
1	Feed domestic hay and forage 18 hours prior to entering wilderness to keep out noxious weeds.

(c) Wild Horses and Burros

# of Comments	Comment
1	Wild horses and burros are not a part of the natural system.
1	Non degredation concept applies.
1	Drop policy.

(9) Minerals Management

(a) Prospecting and Mining

# of Comments	Comment
5	Clarify rights of claiment after inclusion in wilderness and after 12/31/83.
2	Extend mineral entry date.

1	Support policy.
1	Don't allow mining.
1	Tighten rules.
1	Intent of law is not to require mineral exam for every claim.
1	Valid claim must be defined as valid discovery after 1984.
1	Use economic feasibility standard instead of balancing language.
1	Prefer statements on mining found in 12/15/80 draft.
1	Section should be similar to grazing to be fair.
1	Address valid existing rights after 1984.
1	Define "mineral", "mineral prospecting" and "mining".

Plans of Operations

# of Comments	Comment
3	Develop criteria for approval.
2	Delete reference that a valid discovery must be made prior to approval.
1	Should be flexible to allow operator to perform reasonable and incidential activities.
1	Allow comment on plan by all interested parties.
1	Should not apply to fee or State owners of minerals.
1	Support policy.
1	Not sufficient personnel to process.
1	Areas with critical mineral should be managed by plan of operations, not WMP.
1	Bonding mandatory.
1	Consider operator economics.
1	Do not limit approval to minimum necessary activity.
1	Establish formal criteria for identifying mineral resources.

Access

# of Comments	Comment
9	DM does not have authority to determine validity of claim prior to approving the use of motorized vechicles.
3	Do not time access to low visitor use season.
2	Supports policy.
1	Delete phrase requiring consideration of foot and horseback first.

Timber

# of Comments	Comment
1	Timber cut should be in immediate area of mine.

Fire

# of Comments	Comment
1	Operator should not be expected to take initial action.

Site Reclamation

# of Comments	Comment
2	Do not return bond until completed.
2	Need to consider restoration of depleted areas.
1	Consider alternatives to requiring topsoil.

Unnecessary or Undue Degradation

# of Comments	Comment
1	Apply "logical pace and progression "and" minimum tool" as standard.

(b) Mineral Patents

# of Comments	Comment
1	Does not cover Wilderness Act provisions.

(c) Common Varities of Mineral Materials

# of Comments	Comment
1	Allow removal.

(d) Mineral Leasing

# of Comments	Comment
7	Expand criteria, need more detailed guidance.
4	Director does not have authority to deny leases because of wilderness.

4	Add: "Stipulations shall be guided by temperary vs permanent, and repairable vs irrepairable harm standards".
1	Director should consider only ingress/egress and restoration.
1	Limit leasing only to people who have finanical backing.
1	Extend 12/31/83 deadline.
1	Lease stipulations should be reasonable.
1	Oil and gas operations are compatible with wilderness.
1	Do not permit leasing after 1983.
1	Concur with stipulations.
1	Discuss valid existing rights after 12/31/83.

(10) Administrative Structures and Facilities

# of Comments	Comments
2	Support policy.
1	Should allow maintenance and use of airfields and helipads in emergencies-outweighs detrimental effects.
1	Allow new air fields for emergency purposes.
1	Airfields should blend with natural environment.
1	Shelters not a "minor" item.
1	Should not have to receive Director's approval for other agencies to use.
1	No new structures.
1	Reword to consider slope protection or drainage facilities.
1	"Minimum tool" concept should apply.
1	Commercial facilities should blend with natural environment.

(11) Use of Motorized and Mechanical Equipment

# of Comments	Comment
3	Allow use to pursue wildlife related crimes.
2	Identify goals of policy.
2	#12 add: "unless otherwise provided herein."
1	DM does not have authority to limit use to periods outside heavy use season.
1	Abuse should lead to revocation of permit and liability for damages.
1	Restriction on use by other Federal agencies fails to recognize functions required of them by law.
1	Allowance for use is excessive.
1	Travel will "normally" be non-motorized gives too much leeway.

1	Expand policy to allow low flight of aircraft for power plant site and transmission line route investigation and to gather wildlife data.
1	Allow use of snow machines for snow measurement.
1	Allow continued use of motorized equipment to maintain existing water structure.
1	Conflict with Wilderness Act and Immigration and Nationality Act.
1	Add provision to allow for off- ROW maintenance.
1	Allow only for emergency purposes.
1	Supports use for research/study purposes.
1	Permit military flights in all US airspace above wilderness.

(12) Research and Studies

# of Comments	Comment
2	Policy should recognize motorized equipment is essential for fish and wildlife research and management.
2	3rd paragraph ambiguous.

(13) Other

# of Comments	Comment
1	Definitions-include "structures".
1	Definitions-include "restore".
1	Need section titled, "Energy needs". Covering energy conservation, production, transportation, self-sufficiency.
1	Add a clause permitting energy and resource development.
1	Sec. 5(b) of Wilderness Act contridicts draft policy regarding subsurface owner's rights.

(14) Implementation of the Policy

# of Comments	Comments
2	Supports policy of updating Wilderness Management Plans (WMP).
1	WMP should contain provisions to allow modification of policy on fish stocking in barren waters.
1	Asserts fee owner of minerals may not be conditioned by BLM's prior approval.
1	Involve highway agencies in public participation programs.

1	Would require funding for wilderness personnel-prohibited by Wilderness Act.
1	BLM personnel have little experience in wilderness management.
1	Wilderness management decisions must be carefully scrutinized.

2. General Comments

Comments on the Introduction (Chapter I) and on the policy document as a whole and not related to any specific portion.

(a) Comments on Introduction (Chapter I)

# of Comments	Comment
12	Principle of Nondegradation clarify; does not apply to nonconforming uses; might conflict with "unnecessary and undue degradation"; does apply to nonconforming uses.
4	No authority to augment multiple use management on adjacent lands.
3	Nonconforming uses should not apply to preserving wilderness character.
2	Wilderness areas are not preserved for perpetuity.
2	Wilderness Act does not refer to nondegradation.
2	Draft policy correctly recognizes mandates.
2	Expand "Special Features" terminology to include multiple use.
2	Welcomes acknowledgement of specific provisions of Wilderness Act and FLPMA.
2	BLM's main goal should be maintenance of wilderness values.
2	Wilderness character and wilderness resource different.
1	Section 4(b) of Wilderness Act misquoted.
1	Concept of solitude unclear.
1	Wilderness Act mandate includes protection of "natural features".
1	Disagree that managers must use best judgement.
1	Discribe difference between pure and absolute wilderness.
1	Do not use "applicant" with "an owner in fee".
1	Statements in general policy conflict with Alaska Lands Act.
1	Supports concept of wilderness as part of multiple use.
1	BLM should not preserve wilderness if activities may be restricted altogether.
1	Include economic impact of assessing "reasonable mitigation of impacts".

1	"Special Features" - erroneously implies an area may be classified wilderness because of and with the absence of essential criteria.
1	Add wording to "special excepted activities": water resource developments, power projects, transmission lines and access.

(b) Comments in General on Draft Policy

# of Comments	Comment
12	Editing errors.
4	Withdraw draft because of new Administration attitude toward wilderness and RMOGA suit.
4	Policy pre-mature at this time.
3	Support relationship to Forest Service policy.
2	Too much emphasis on nonconforming uses.
2	Policy needs more management flexibility.
1	Need to do a cost/benefit analysis.
1	Wilderness areas should not be managed.
1	Policy should be on a Federal election ballot.
1	Do not allow manager to make judgement without public comment.
1	Provide for military operations adjacent to wilderness.
1	Management needs more direction.
1	Do not manipulate wilderness environment.
1	"Specific Policy Guidance" unrealistic.
1	Chapter I should be included in final.
1	Policy is consistent with congressional mandate and FS policy.
1	Format difficult to follow.
1	Overly detailed and restrictive.
1	Does not have a relationship to study policy.
1	Draft policy calls for more strict limitations on activities than Wilderness Act.
1	Should be included in 43 CFR.

(c) Change Policy

# of Comments	Comment
2	Allow multiple-use activities where compatible.
1	Rewrite policy to emphasize/reflect new administration philosophy.
1	Rewrite and allow developments only for health and safety of visitor.
1	Condense and simplify policy.
1	Provide for greater flexibility.
1	Change to be more consistent with FS.
1	Change to evaluate wilderness suitability on recurring basis.

(d) Missing Policy

# of Comments	Comment
1	Policy on control of impact of horses and burros.
1	Policy on dogs.
1	Policy on fish and wildlife.
1	Policy on involvement of SCS in coordinated planning of adjacent and surrounded private lands.
1	Explain in introduction Alaska exemption under 603 FLPMA.

C. Other Issues and Topics

1. Unrelated

# of Comments	Comment
14	Release lands to private ownership for energy production.
5	Wilderness allocation.
4	Sagebrush rebellion.
4	Wilderness inventory.
3	IMP
3	RMOGA suit.
3	Study related.
2	Discussion of commercial trapping on public lands.
1	Motorized vehicles.
1	Preparing for wilderness visit.
1	Integrity of wilderness management personnel.
1	EA and Plan of Operation procedures.
1	Amend FLPMA.
1	Multiple use.

2. Amend Wilderness Act

# of Comments	Comment
2	Extend mineral entry date 20 years as 1964 Act did.
1	Allow equal provisions for RV and camping as for mining and grazing.
1	Amend Wilderness Act to include Congress' Grazing Guidelines.
1	Change definition of wilderness in Wilderness Act.
1	Some legal nonconforming uses should be prohibited.
1	Pre-existing trapping should have the same rights as pre-existing grazing.
1	Don't allow mining - conflicts with concept of naturalness.
1	Allow prior use of ORV's to continue like for aircraft and motorboats.
1	Range users needs and not just resource protection.
1	Remove Presidential authority to allow new water developments.
1	Reevaluate all wilderness areas.
1	Change reference to no commercial enterprise and add "that would advocate the unnecessary and undue degredation of the lands."
1	Add to 4(d)(4) President may authorize power projects, transmission lines and access thereto.
1	According to Wilderness Act, wilderness is not managed in perpetuity.

Appendix 1 : List of Respondents

A. Governments

1. Federal

-Nuclear Regulatory Commission, Washington, D.C.
-Office of Trust Responsibilities, Bureau of Indian Affairs, Washington, D.C.
-Intermountain Forest and Range Experiment Station, US Forest Service, Missoula, MT
-Immigration and Naturalization Service, US Dept. of Justice, Washington, D.C.
-Congressman Marlenee, Montana
-EPA, Washington, D.C.
-US Geological Survey, VA
-Dept. of the Air Force, Washington, D.C.
-Bureau of Indian Affairs, Portland, OR
-Soil Conservation Service, Washington, D.C.
-Water and Power Resource Services, Washington, D.C.
-National Park Service, Washington, D.C.
-US Forest Service, Washington, D.C.

2. State

-Texas Park and Wildlife Dept., Austin, TX
-Department of Transportation, Sacramento, CA
-Fisheries Management Section, Michigan Department of Natural Resources, Lancing Michigan.
-Game and Fish Department, Phoenix, AZ
-Governors' Office, Wyoming
-Governors' Office, Oregon
-Forestry Dept., Oregon
-Florida Game and Fresh Water Fish Comm.
-Game and Fish Commission, Little Rock, Arkansas
-Secretary of State, Idaho
-Dept. of Natural Resources, Ohio
-Dept. of Fish and Game, New Mexico
-Game and Fish Division, Dept. of Natural Resources, Georgia
-Dept. of Fish and Game, Montana
-Dept. of Environmental Conservation, New York
-Dept. of Fish and Wildlife, Oregon
-Dept. of Natural Resources, Michigan
-Washington, State Farm Bureau
-Governor's Office (State-Federal Assistance Coordinator), Alaska
-Dept. of Agriculture, New Mexico
-Dept. of Fish and Game, Idaho
-Governor's Office, Utah
-State Lands Commission, California
-Parks and Recreation Comm., Washington

-State Land Department, Arizona
-Pennsylvania Game Comm., Penn.
-Division of Wildlife, Colorado
-Dept. of Fish and Game, Alaska
-Dept. of Highways, Montana

3. Country and Local

-Beaverhead County Planning Dept., Dillon, Montana
-East Central Oregon Association of Counties, Pendleton, Oregon

B. Industry

Mobil Oil Corporation
United Gas Pipe Line Company
American Gas Association
Union Carbide Corporation
New Mexico Oil and Gas Association
Getty Oil Company
Santa Fe Pacific Railroad Company
Montana Power Company
Utah Power and Light Company
Chevron, U.S.A.
Marathon Oil Company
Sierra Pacific Power Company
Champlin Petroleum Company
Texaco, U.S.A.
Rocky Mountain Oil and Gas Association
True Oil Company
Sunmark Exploration Company
Wexpro Company
Standard Energy Corporation
Colombia Gas System Service Corporation
Butte Resources Company
F.H. Stoltze - Land and Lumber Company
Exxon Company, U.S.A.
Resources Company
Southern California Edison Company
Conoco, Inc.
Atlantic Richfield Company
Western Counsel to Phelps Dodge
AMOCO Production Company

C. Formal Group

Missouri Breaks Multiple Use Association
Owyhee Cattlemen's Association
Oregon Wilderness Coalition
The Committee for Idaho's High Desert
Toiyabe Chapter, Sierra Club
Tooele County Wildlife Federation

Arizona Trappers Association
California Trappers Association
California Wildlife Federation
Continental Divide Trail Society
Colorado Historical Society
Utah Antiquities Association
Citizens Committee to Save Our Public Lands
Idaho Trail Machine Association
American Mining Congress
Idaho Cattlemen's Association
National Cattlemen's Association, Public Lands Council.
The American Alpine Club
Colorado Trappers Association
Enos Mills Group, Sierra Club
California Mining Association
American Petroleum Institute
Crook County Stockgrowers
International Association of Fish and Wildlife Agencies
Sierra Club, Friends of the Earth, National Audubon Society, Wilderness Society
Aircraft Owners and Pilots Association
National Animal Damage Control Association
New-Mexico Trappers Association
National Trappers Association
Idaho Trappers Association
Idaho Woolgrowers Association
District 5, Idaho Trappers Association
Nevada Cattlemen's Association

D. Individuals

Appendix 2: Management Questions and Concerns

I. Purpose and Mandate

1. Has BLM adequately interpreted the Congressional wilderness mandates found in Sec. 603 of FLPMA and the Wilderness Act of 1964?

   Is the discussion clear?

   From the interpretation, has policy been properly formulated?

2. Have we given a proper application, interpretation, and priority to comments in Congressional committee reports?

   Should we give more emphasis? Less?

3. Is our discussion of the three basic concepts which form BLM's wilderness management policy correct?

   a. Wilderness preservation concept?

   b. Wilderness use concept?

   c. Nonconforming use concept?

4. Is the principle of nondegradation appropriate for BLM's management policy?

   Is the policy as stated understandable and provide clear guidance?

II. Management Policy

1. Does the policy provide for preservation of wilderness character in perpetuity?

2. Are the nonconforming but specially accepted uses given adequate treatment? Need clearification? Changes?

3. Is the treatment of wilderness uses (i.e. recreation, etc.) verses preservation of wilderness character in proper perspective.

   Should the wilderness resource be dominant in all management decisions where a choice must be made between preservation of wilderness character and visitor use?

   Should highest priority of use be accorded those activities which are: (1) dependent upon wilderness enviroment and cannot be handled elsewhere, and 2) least affect the wilderness environment?

4. Does management policy provide adequate guidance to determine the criteria of manageability during suitability studies?

5. Are the policies adequate to guide the field offices in developing substantial wilderness management plans?

6. Are BLM's wilderness management policies consistent with the policies of other agencies administering areas within the National Wilderness Preservation System?

7. Should a separate policy on solitude remain as a primary element in the management of BLM wilderness?

8. Should management of designated wilderness augment multiple use management of adjacent and nearby lands? Creation of buffer zones?

9. Are policies flexible enough to allow managers the opportunity to address situations unique to their particular area?

   Do they provide adequate guidance when a particular situation is not specifically addressed by policy or specific guidelines?

   Do they provide consistency in the management of all BLM wilderness areas, but allow enough flexibility to address local situations?

10. Do the policies provide for management guided by the following principles:

    a. Is it necessary to protect the resource and manage the use?

    b. Is it the minimum action or facility required to accomplish the objective?

    c. Does it protect the wilderness values?

    d. Does it pass a test of reason and common sense?

III. Specific Activity Guidance

The following list of questions are to be answered for each of the elements listed under Specific Activity Guidance:

1. Is the specific policy adequate to provide direction for management in actual situations? Why? Why not?

2. Should changes be made in the policy? How? More clearification?

3. Are there any management concerns not covered by the specific policy that should be included?

Specific Activity Guidelines

A. Recreation and Visitor Use

1. Visitor Management

a. Indirect Methods
b. Direct Methods

2. Improvements and Facilities

a. Trail Systems
b. Signing
c. Use of Campsites
d. Outfitter Camps

3. Fuelwood

4. Contests

5. Recreational or Hobby Mineral Collecting

B. Cultural and Historic Resources

C. Forestry Resources

1. Cutting of Trees and Shrubs

2. Cutting of Trees for Administrative Purposes

3. Cutting of Trees for Fuelwood

4. Reforestation

D. Fish and Wildlife

1. Hunting and Fishing

2. Wildlife Habitat

3. Wildlife Manipulation

4. Fish Stocking

5. Trapping

6. Rodents

7. Predators

E. Fire, Insect, and Disease Management

1. Fire Management

a. Overriding Fire Guidance
b. Natural Fire
c. Prescibed Burning
d. Removal of Evidence of Fire Control Activities
e. Fire Detection
f. Pre-Suppression
g. Suppression
h. Fire Management Plans

2. Control of Insects and Disease

F. Water Resources Management

1. Watershed Restoration

2. Water Improvements

a. Water-Yield Improvements
b. New Water-Development Structures
c. Existing Structures
d. Snow Measurement
e. Water Quality
f. Weather Modification Over Wilderness

G. Air Quality

H. Rangeland Management

1. Livestock Grazing Operations (includes Congressional Grazing Guidelines)

a. Management Plans
b. Permits
c. Rangeland Analysis
d. Rangeland Improvements
e. Sturctural Rangeland Improvements
f. Non-structural Rangeland Improvements

2. Recreational Livestock

3. Wild Horses and Burros

I. Minerals Management

1. Prospecting and Mining

2. Mineral Leasing

3. Mineral Patents

4. Common Varities of Mineral Materials

5. Paleontological Resources

J. Administrative Structures and Facilities

1. Administrative Sites

2. Fences

3. Trails

4. Airfields

5. Heliports and Helispots

6. Communication Facilities

7. Structures and Facilities Constructed, Used or Proposed by Other Agencies

K. Use of Motorized and Mechanical Equipment

L. Research and Studies

IV. Implementation of the Wilderness Management Policy

APPENDIX 3: Article responsible for approximately 170 comments received on the issue of commercial trapping. Most comments were in the form of pre-printed post cards or form letters.

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The TRAPPER

Editor's Notes

tom krause

Washington—The Federal Register, Vol. 46, No. 11, Friday, January 16, 1981. Proposed regulatons for federal BLM lands would allow no "commercial" trapping on 20 million plus acres of mostly western lands. Comments will be received until April 1st. I urge you to write and request that the sentence, "Commercial trapping will not be permitted," be removed from the proposed regulations. Please direct your comments to:

Director (430)
Bureau of Land Management
1800 C St., NW
Washington, D.C. 20240